

June 8, 2007

Mr. Tommy Flynn
Bureau of Air Quality
SCDHEC
2600 Bull Street
Columbia, SC 29201

Re: Network Description and Ambient Air Network Monitoring Plan
Anderson Chamber Of Commerce Comments

Dear Mr. Flynn:

The members of the Health, Safety & Environment Committee of the Anderson Chamber of Commerce thank the Bureau of Air Quality for the extensive efforts you have made for public input into the Ambient Air Monitoring Network plan review for 2007.

Our Health, Safety and Environment Committee has been following the developments in upstate air issues, including a recent visit to this committee by Messrs. John Litton, Brian Barnes, and Robbie Brown on May 9, 2007. Their remarks were very informative, covering the range of the purpose of the monitoring network, consequences of non-attainment, and steps to take as companies and individuals to help reduce impacts on air quality.

Several of our Health, Safety and Environment Committee members are also members of the South Carolina State Chamber Environmental Technical Committee. We concur with the Environmental Technical Committee's comments on the *Network Description and Ambient Air Network Monitoring Plan* (Monitoring Plan) and proposed redline version of the Monitoring Plan. In addition, we want to emphasize several issues.

First, we believe that all monitors used to determine compliance with National Ambient Air Quality Standards should meet all of the Federal Regulations 'musts' and as many monitoring siting guidance 'shoulds' as possible. This reflects sound science and sound practices, and is intended to collect representative data which can be used with confidence in determining compliance with standards.


Second, the Monitoring Plan proposes to add a new monitoring site in Greenville County and recommends replacing the Greenville County Health Department monitor with the new monitor if, after a year, data are 'comparable' for the two monitors. As there are concerns that the Greenville County Health Department monitor may not be representative of ambient air conditions (due to local conditions/sources) and the location does not meet one of the 40 CFR 58 Appendix E criteria, the objective of using an alternate monitor is to represent ambient air conditions for the broad area. If the new monitor is located to meet regulatory and guidance 'musts' and 'shoulds', and is not influenced by local sources, then it should be considered for use in determining compliance with standards. A goal of generating 'comparable' data to the Greenville County Health Department in order to consider relying on the new monitor is not valid.

Finally, we want to recognize that we understand that an ultimate goal of the monitoring network is to assess air quality and provide protection for public health. We fully support the protection of our employees and citizens of our community, and support the existing Early Action Compact activities. If there are air quality issues that need to be addressed through additional voluntary or mandatory actions,

we stand ready to support these actions. However, we ask that any such actions be based on a representative, accurate, and reliable monitoring network such that resources expended to protect public health are wisely directed and achieve improvements in public health.

Thank you again for the efforts of the Bureau of Air Quality staff and for the work with the various stakeholders groups throughout this process.

Sincerely,

A handwritten signature in cursive script, reading "Daniel Theobald". The signature is written in dark ink on a light-colored background.

Daniel Theobald, Chairman
Health, Safety & Environment Committee